STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF TAP ROCK OPERATING, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 24754

TAP ROCK'S PRE-HEARING STATEMENT

Tap Rock Operating, LLC ("Tap Rock") submits this Pre-Hearing Statement for the abovereferenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u> Tap Rock Operating, LLC

ATTORNEY

Jennifer L. Bradfute jennifer@bradfutelaw.com Phone: 505-264-8740

OTHER PARTIES

COG Operating, LLC Concho Oil and Gas LLC

ATTORNEY

Holland & Hart Michael H. Feldewert Adam G. Rankin Paula M. Vance (505) 988-4421 <u>mfeldewert@hollandhart.com</u> <u>agrankin@hollandhart.com</u> <u>pmvance@hollandhart.com</u>

EOG Resources, Inc.

Jordan L. Kessler 125 Lincoln Ave., Suite 213 Santa Fe, NM 87501 (432) 488-6108 jordan kessler@eogresources.com

STATEMENT OF CASE

This case is set for hearing on October 3, 2024. In Case No. 24754, Applicant seeks an order pooling a standard 1280 acre, more or less, horizontal well spacing unit in the Wolfcamp formation comprised of all of Sections 9 and 10, Township 25 South, Range 25 East NMPM, Eddy County, New Mexico, to be initially dedicated to the proposed Upslope Fed Com 202H, Upslope Fed Com 204H, Upslope Fed Com 211H, and Upslope Fed Com 213H wells to be horizontally drilled as follows:

- Upslope Fed Com #202H, which will be drilled from a surface hole location the SE/4 NE/4 of Section 10 (Unit H) to a bottom hole located 5 Feet from the West Line in Section 9 and 2,360 Feet from the North Line in Section 9 (Unit E).
- Upslope Fed Com #204H, which will be drilled from a surface hole location the NE/4 SE/4 of Section 10 (Unit I) to a bottom hole located 5 Feet from the West Line in Section 9 and 330 Feet from the South Line in Section 9 (Unit M).
- Upslope Fed Com #211H, which will be drilled from a surface hole location the SE/4 NE/4 of Section 10 (Unit H) to a bottom hole located 5 Feet from the West Line in Section 9 and 990 Feet from the North Line in Section 9 (Unit D).
- Upslope Fed Com #213H, which will be drilled from a surface hole location the NE/4 SE/4 of Section 10 (Unit I) to a bottom hole located 5 Feet from the West Line in Section 9 and 1,520 Feet from the South Line in Section 9 (Unit L).

Also, to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, actual operating costs and charges for supervision, designation of Tap Rock Operating, LLC as operator of the wells, and a 200% charge for risk involved in drilling said wells. The subject area is located approximately 2.15 miles east of Whites City, New Mexico.

PROPOSED EVIDENCE

Currently, there are no objections to the case being presented by affidavit and Tap Rock intends to present this case by affidavit at the October 3, 2024 hearing.

Witness	Estimated Time	Exhibits
Erica Shewmaker - Landman	Affidavit	Exhibits A – A-7
Matthew Jones - Geologist	Affidavit	Exhibit B – B-6
Jennifer Bradfute- Counsel	Affidavit	Exhibits C – C-4

PROCEDURAL MATTERS

None.

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Respectfully submitted,

2/1 By: Jennifer L. Bradfute

Bradfute Consulting & Legal Services P.C., d/b/a Bradfute Sayer P.C. P.O. Box 90233 Albuquerque, NM 87199 Phone 505.264.8740 jennifer@bradfutelaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on September 26, 2024:

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QUESTIONS

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Action 387455

QUESTIONS

Operator:	OGRID:
TAP ROCK OPERATING, LLC	372043
523 Park Point Drive	Action Number:
Golden, CO 80401	387455
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses		Not answered.
Testimony time (in minutes)		Not answered.